

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

TRAVELODGE HOTELS, INC.,	)	CASE NO. C-1-01 784
	)	
Plaintiff,	)	JUDGE WEBER
	)	
V.	)	
	)	
GOPAL GOVAN,	)	
	)	
Defendant/Third-Party	)	<b><u>AFFIDAVIT OF STEVEN A. GOLDFARB</u></b>
Plaintiff,	)	<b><u>REGARDING AWARD OF ATTORNEYS</u></b>
	)	<b><u>FEES AND COSTS TO PLAINTIFF</u></b>
	)	
V.	)	
	)	
CINCINNATI TRAVELODGE,	)	
	)	
	)	
Third-Party Defendant.	)	
	)	
STATE OF OHIO	)	
	)	SS:
COUNTY OF CUYAHOGA	)	

I, STEVEN A. GOLDFARB, being first duly sworn, depose and state as follows:

1. I am more than twenty-one years of age and I am competent to make this

Affidavit.

2. I am a partner in the law firm of Hahn Loeser & Parks LLP in Cleveland, Ohio, which represents Plaintiff Travelodge Hotels, Inc. ("THI") in the instant matter. As such, I have personal knowledge of all matters testified to herein.

3. THI has incurred attorneys' fees in connection with this matter in the total amount of \$65,645.00 as of March 3, 2004, and has incurred costs in connection with this matter in the total amount of \$4,163.57 as of March 3, 2004. The invoices identifying the attorneys fees and costs incurred by THI in this matter as of March 3, 2004 are attached hereto as Exhibit 1 – 14.

4. As reflected in the attached invoices, much of the fees incurred by THI in this matter were necessitated by the claims wrongfully asserted by Govan against THI; which the Court recognized in its July 17, 2002 Opinion denying in part and granting in part THI's Motion to Dismiss, and in its January 8, 2003 Opinion granting THI's Motion for Summary Judgment in favor of THI on its claims against Govan and granting judgment in favor of THI on Govan's Counterclaims against it.

5. THI would therefore have incurred significantly lower attorneys fees and costs in this matter if it only had to proceed with respect to its claims against Govan, and not defend itself with respect to the claims wrongfully asserted by Govan.

6. I have reviewed the attached invoices and believe that the attorneys fees and costs reflected therein were necessary and are reasonable.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Steven A. Goldfarb  
Steven A. Goldfarb

SWORN TO AND SUBSCRIBED in my presence  
this 8/1 day of March 2004.

Elizabeth A. Horning  
Notary Public  
ELIZABETH A. HORNING  
NOTARY PUBLIC, State of Ohio  
My Commission Expires 8/24/05